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May 16, 2022

VIA ECF

The Honorable Lorna G. Schofield
United States District Court
Southern District of New York
40 Foley Square
New York, New York, 10007

Re: *United States v. Lira*, 22-CR-151 (LGS)

Dear Judge Schofield:

As defense counsel for Eric Lira, I am writing to respectfully request an amendment to the conditions set out in the letter motion submitted by the Government on May 10, and adopted by this Court on May 11, 2022. The letter was submitted for the purpose of asking the Court to adopt the bail conditions imposed in the Western District of Texas, to which Defendant agreed.

However, there was one point upon which the conditions set out in the letter did not mirror the conditions set in Texas: The bond in Texas, upon which defendant was released, was \$100,000 corporate surety (although he had the option of posting the entire amount in cash). The condition set out in the letter is \$100,000 cash, deposited into the Registry of the Court, without the option of a corporate surety.

Defense counsel has consulted with Assistant United States Attorney Sarah Mortazavi, who has represented that the Government agrees that the bail condition should be \$100,000 cash or corporate surety, so that Mr. Lira can post bail through a corporate surety, as he did in Texas.

Therefore, it is respectfully requested that the Court impose the bail conditions set out in the Government's letter motion of May 10, 2022, with the amendment of the first condition as follows:

- \$100,000 bond, secured by cash deposit of that amount in the Registry of the Court, or secured by a corporate surety.

Respectfully submitted,


Mary Stillinger